

# **Exhibit 1**



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# Transcript of Nozomu Tsunoda

**Date:** January 26, 2023

**Case:** Legalforce RAPC Worldwide -v- Legalforce, Inc.

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

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LEGALFORCE RAPC WORLDWIDE, P.C., :  
Plaintiff, :  
v. : Case No.  
LEGALFORCE, INC., a Japanese : 3:22-cv-03724-TLT  
corporation, :  
Defendant. :  
- - - - - x

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Deposition of  
NOZOMU TSUNODA  
Tokyo, Japan  
Thursday, January 26, 2023  
10:16 a.m. Japan Standard Time (UTC+9)

Job No.: 478533  
Pages: 1 - 75  
Reported By: M. Allred, RPR

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Transcript of Nozomu Tsunoda

January 26, 2023

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1                   Deposition of NOZOMU TSUNODA, conducted at  
2                   the offices of:

3  
4                   U.S. EMBASSY IN JAPAN - TOKYO

5                   1-10-5 Akasaka

6                   Minato-ku, Tokyo 107-8420

7                   Phone: +81-03-3224-5000  
8  
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10                  Pursuant to notice, before M. Allred,  
11                  Registered Professional Reporter.  
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Transcript of Nozomu Tsunoda

January 26, 2023

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A P P E A R A N C E S

ON BEHALF OF PLAINTIFF:

RAJ ABHYANKER, ESQUIRE

LEGALFORCE RAPC WORLDWIDE P.C.

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ON BEHALF OF DEFENDANTS:

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Phone: +81-3-3431-6943

ALSO PRESENT:

NAOKO SELLAND, Interpreter

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Transcript of Nozomu Tsunoda

January 26, 2023

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MR. ABHYANKER: Can you please translate that.

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Q So my question is Mr. Kama's LinkedIn profile says he started working in July 2022 in Exhibit 10. And in Exhibit 9 on -- in that same month, July 2022, it indicates that that job is no longer accepting applications.

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14

15

So is it reasonable to conclude that Mr. Kama was hired in response to this job posting in Exhibit 9?

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19

A No. Most recruitment at our company is done not via SNS like LinkedIn on this ad but by Japanese recruitment company. So I believe Mr. Kama was also hired through that recruitment agencies in Japan.

20

21

Q What is the name of the recruitment agency in Japan?

22

23

A There are many; although it is managed by recruitment team at the company.

24

25

Q All right. I'm going to move on from this exhibit.

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Transcript of Nozomu Tsunoda

January 26, 2023

67

1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]

4 Q Did your company, LegalForce Japan, ever  
5 want to use the name "LegalForce" in the  
6 United States?

7 A No. I was aware that the opposition was  
8 filed in 2018. So I --

9 THE INTERPRETER: Sorry. Let me start from  
10 the scratch.

11 (The witness and interpreter conferred in  
12 Japanese.)

13 A The answer is no. Because I understood that  
14 there was an opposition filed in 2018, and I had  
15 respect to the trademark by the plaintiff. So when  
16 we expanded to the US, I always thought that  
17 trademark should have been changed -- should be  
18 changed.

19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]

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